

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

BEARBOX LLC and AUSTIN
STORMS,

Plaintiffs,

v.

LANCIUM LLC,
MICHAEL T. MCNAMARA, and
RAYMOND E. CLINE, JR.,

Defendants.

REDACTED PUBLIC VERSION

Civil Action No. 21-534-MN

JURY TRIAL DEMANDED

**DECLARATION OF CHELSEA MURRAY IN OPPOSITION TO
DEFENDANTS' SECOND MOTION FOR SUMMARY JUDGMENT
(REGARDING DAMAGES) AND MOTION TO EXCLUDE OPINIONS OF DAVID DUSKI**

I, Chelsea Murray, declare as follows:

1. I am one of the attorneys representing the Plaintiffs Bearbox LLC and Austin Storms in this matter. I am an attorney admitted to practice law in the State of Illinois and before this Court (pro hac vice), and I am an associate of the law firm of Marshall, Gerstein & Borun LLP.

2. I am above the age of eighteen. I make this declaration of my own personal knowledge. If called to testify as to the truth of the matters stated herein, I could and would testify competently.

3. I submit this declaration and the attached exhibits in support of Plaintiffs' Brief in Opposition to Defendants' Second Motion for Summary Judgment (Regarding Damages) and Motion to Exclude Opinions of David Duski.

4. Attached hereto as Exhibit EE is a true and correct copy of the Reply Expert Report of David R. Duski.

5. Attached hereto as Exhibit FF is a true and correct copy of LANCIUM00035934-39, produced by Defendants in this case.

6. Attached hereto as Exhibit GG is a true and correct copy of LANCIUM00021608, produced by Defendants in this case.

7. Attached hereto as Exhibit HH is a true and correct copy of LANCIUM00031208-11, produced by Defendants in this case.

8. Attached hereto as Exhibit II is a true and correct copy of LANCIUM00031205, produced by Defendants in this case.

9. Attached hereto as Exhibit JJ is a true and correct copy of RIOT 000044-65, produced by third-party Riot Blockchain in this case.

10. Attached hereto as Exhibit KK is a true and correct copy of LANCIUM00036028-36, produced by Defendants in this case.

11. Attached hereto as Exhibit LL is a true and correct copy of LANCIUM00035926-33, produced by Defendants in this case.

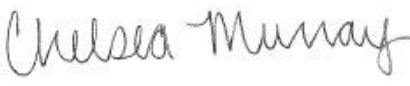
12. Attached hereto as Exhibit MM is a true and correct copy of excerpts from the Deposition Transcript of Frank McCamant.

13. Attached hereto as Exhibit NN is a true and correct copy of excerpts from the Deposition Transcript of Michael McNamara.

14. Attached hereto as Exhibit OO is a true and correct copy of excerpts from the Deposition Transcript of David Duski.

I declare under penalty of perjury that the foregoing is true and correct.

Date: July 22, 2022

By: 
Chelsea Murray

CERTIFICATE OF SERVICE

I hereby certify that on the 22nd day of July, 2022, the attached **DECLARATION OF CHELSEA MURRAY IN OPPOSITION TO DEFENDANTS' SECOND MOTION FOR SUMMARY JUDGMENT (REGARDING DAMAGES) AND MOTION TO EXCLUDE OPINIONS OF DAVID DUSKI** was served upon the below-named counsel of record at the address and in the manner indicated:

Chad S.C. Stover, Esquire
Barnes & Thornburg LLP
222 Delaware Avenue, Suite 1200
Wilmington, DE 19801

VIA ELECTRONIC MAIL

Mark C. Nelson, Esquire
Barnes & Thornburg LLP
2121 N. Pearl Street, Suite 700
Dallas, TX 75201

VIA ELECTRONIC MAIL

Adam M. Kaufmann, Esquire
Barnes & Thornburg LLP
One N. Wacker Drive, Suite 4400
Chicago, IL 60606-2833

VIA ELECTRONIC MAIL

/s/ Andrew C. Mayo

Andrew C. Mayo

EXHIBITS EE THROUGH OO

REDACTED IN THEIR
ENTIRETY